

**McCARTER & ENGLISH, LLP**

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*Attorneys for Defendants E. I. du Pont de Nemours*

*and Company, The Chemours Company, and The*

*Chemours Company FC, LLC*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

KIMBERLY BOND and RICHARD BOND,  
individually, and as parents and natural  
guardians of CHRISTINA BOND,

Plaintiffs,

v.

SOLVAY SPECIALTY POLYMERS, USA,  
LLC; SOLVAY SOLEXIS, INC.; ARKEMA,  
INC.; E. I. DU PONT DE NEMOURS &  
COMPANY; THE CHEMOURS  
COMPANY; THE CHEMOURS COMPANY  
FC, LLC; THE 3M COMPANY; and JOHN  
DOE ENTITIES #1-10,

Defendants.

THERESA SLUSSER and WILLIAM  
SLUSSER, individually, and as parents and  
natural guardians of ALEXANDER  
SLUSSER,

Plaintiffs,

v.

SOLVAY SPECIALTY POLYMERS, USA,  
LLC; SOLVAY SOLEXIS, INC.; ARKEMA,  
INC.; E. I. DU PONT DE NEMOURS &  
COMPANY; THE CHEMOURS

Civil Action No. 1:20-cv-08487-NLH-KMW  
Hon. Noel L. Hillman, U.S.D.J.

**Motion Date: August 2, 2021**

***Oral Argument Requested***

Civil Action No. 1:20-cv-11393-NLH-KMW  
Hon. Noel L. Hillman, U.S.D.J.

**Motion Date: August 2, 2021**

***Oral Argument Requested***

COMPANY; THE CHEMOURS COMPANY  
FC, LLC; THE 3M COMPANY; and JOHN  
DOE ENTITIES #1-10,

Defendants.

TAMMY O'LEARY and CORBY DEESE,

Plaintiffs,

v.

SOLVAY SPECIALTY POLYMERS, USA,  
LLC; SOLVAY SOLEXIS, INC.; ARKEMA,  
INC.; E. I. DU PONT DE NEMOURS &  
COMPANY; THE CHEMOURS  
COMPANY; THE CHEMOURS COMPANY  
FC, LLC; THE 3M COMPANY; and JOHN  
DOE ENTITIES #1-10,

Defendants.

CARLY CORRAR and SHIRLEY BOND,

Plaintiffs,

v.

SOLVAY SPECIALTY POLYMERS, USA,  
LLC; SOLVAY SOLEXIS, INC.; ARKEMA,  
INC.; E. I. DU PONT DE NEMOURS &  
COMPANY; THE CHEMOURS  
COMPANY; THE CHEMOURS COMPANY  
FC, LLC; THE 3M COMPANY; and JOHN  
DOE ENTITIES #1-10,

Defendants.

SHIRLEY BOND,

Plaintiff,

v.

SOLVAY SPECIALTY POLYMERS, USA,  
LLC; SOLVAY SOLEXIS, INC.; ARKEMA,  
INC.; E. I. DU PONT DE NEMOURS &  
COMPANY; THE CHEMOURS

Civil Action No. 1:21-cv-00217-NLH-KMW  
Hon. Noel L. Hillman, U.S.D.J.

**Motion Date: August 2, 2021**

***Oral Argument Requested***

Civil Action No. 1:21-cv-00452-NLH-KMW  
Hon. Noel L. Hillman, U.S.D.J.

**Motion Date: August 2, 2021**

***Oral Argument Requested***

Civil Action No. 1:21-cv-11203-NLH-KMW  
Hon. Noel L. Hillman, U.S.D.J.

**Motion Date: August 2, 2021**

***Oral Argument Requested***

COMPANY; THE CHEMOURS COMPANY  
FC, LLC; THE 3M COMPANY; and JOHN  
DOE ENTITIES #1-10,

Defendants.

**NOTICE OF DEFENDANTS E. I. du PONT de NEMOURS AND COMPANY,  
THE CHEMOURS COMPANY, AND THE CHEMOURS COMPANY FC, LLC'S  
MOTION TO DISMISS PLAINTIFFS' COMPLAINTS**

TO: THE CLERK OF COURT AND ALL COUNSEL OF RECORD

**PLEASE TAKE NOTICE** that on August 2, 2021, at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendants E. I. du Pont de Nemours and Company, The Chemours Company, and The Chemours Company FC, LLC (collectively, "Defendants") shall move before the Honorable Noel L. Hillman, U.S.D.J., at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, Fourth and Cooper Streets, Camden, New Jersey, for the entry of an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing Plaintiffs' Complaints in the above-captioned actions.

**PLEASE TAKE FURTHER NOTICE** that, in support of this Motion, Defendants will rely upon the Memorandum of Law and the Declaration of Lanny S. Kurzweil and accompanying exhibits submitted herewith, as well as any submissions offered in reply.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order granting the motion is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that oral argument is respectfully requested.

Dated: July 7, 2021

Respectfully submitted,

**McCARTER & ENGLISH, LLP**

*Attorneys for Defendants E. I. du Pont de Nemours  
and Company, The Chemours Company, and The  
Chemours Company FC, LLC*

By: /s/Lanny S. Kurzweil, Esq.

Lanny S. Kurzweil, Esq.

Natalie S. Watson, Esq.

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*Members of the Firm*